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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12 FRESNO DIVISION  
13

14 SANDRA COSTA,  
15

16 Plaintiff,

17 v.

18 KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

19 Defendant.<sup>1</sup>

No. 1:20-cv-01524-EPG

STIPULATION AND ORDER FOR EXTENSION  
TO FILE DEFENDANT'S OPPOSITION TO  
PLAINTIFF'S OPENING BRIEF

20 IT IS HEREBY STIPULATED, by and between Sandra Costa (Plaintiff) and Kilolo  
21 Kijakazi, Acting Commissioner of Social Security (Defendant), by and through their respective  
22 counsel of record, that, with the Court's approval, Defendant shall have an extension of time of  
23 sixty (60) days to file a Response to Plaintiff's Opening Brief. This is Defendant's first request  
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25  
26 <sup>1</sup> Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant  
27 to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted,  
28 therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to  
continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42  
U.S.C. § 405(g).

1 for an extension on her Response to Plaintiff's Opening Brief. The current due date is January 6,  
2 2022. The new date will be March 7, 2022. All other deadlines will extend accordingly.

3  
4 Good cause exists for this request. Defendant's counsel has worked diligently to meet the  
5 timelines provided by the Court but has been prevented from doing so by her busy schedule.  
6 Defendant's counsel has seventy-one other active cases in various stages of litigation and 24  
7 responsive briefs due in the next 60 days including two Ninth Circuit answering briefs.  
8 Additionally, Defendant's counsel has other responsibilities with another practice group in her  
9 office where the work cannot be extended. Defendant's counsel is also covering a colleague's  
10 workload who is out on long-term family leave. Defendant requests this extension in good faith,  
11 and with no intent to delay these proceedings unnecessarily. Defendant apologizes to the Court  
12 for any inconvenience caused by this delay.

13 Respectfully submitted,

14  
15 DATE: December 20, 2021

/s/ Megan Elizabeth Ruble  
MEGAN ELIZABETH RUBLE  
Attorney for Plaintiff  
(as approved via email)

18 PHILLIP A. TALBERT  
Acting United States Attorney

19 DATE: December 20, 2021

By s/ Margaret Lehrkind  
MARGARET LEHRKIND  
Special Assistant United States Attorney

22 Attorneys for Defendant  
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**ORDER**

Pursuant to the parties' stipulation (ECF No. 15), IT IS HEREBY ORDERED that Defendant shall file a Responsive Brief by March 7, 2022. All remaining deadlines in the Scheduling Order (ECF No. 5) are extended accordingly.

IT IS SO ORDERED.

Dated: **December 21, 2021**

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE